

EXHIBIT F

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LLP

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October 28, 2015

Bank of America
Legal Order Processing
DE5-024-02-08
P.O. Box 15047
Wilmington, DE 19850-5047

Re: *SEC v. Steve Chen, et al., CV15-07425 RGK (GJSx)*

Dear Sir or Madam:

I am writing on behalf of Jennifer Zhao and Ally Investors, LLC, whom we represent in the above-referenced matter. We are informed that Bank of America (“BOA”) has frozen the following accounts based on the temporary restraining order (“TRO”) and preliminary injunction (“PI”) that the SEC obtained in the above-referenced case:¹

<u>Account No.</u>	<u>Account Holder</u>
000153374232	UTMA Account for David Chen Li Zhao (Jennifer Zhao is the sole custodian)
000153467748	Ally Investors LLC
325058386448	Ally Investors LLC
000153968387	Ally Investors, LLC
*****65G9	Safe deposit box (held by Jennifer Zhao)

The TRO and PI permit only the freezing of accounts that are identified in those orders or “held in the name of, for the benefit of, or over which account authority is held by” any of the defendants in this case.² None of the accounts listed above satisfy these

¹ Enclosed are the TRO and the PI for your convenience.

² The defendants in the SEC’s case are: Steve Chen; US Fine Investments Arts, Inc.; Alliance Financial Group, Inc.; Amauction, Inc.; Aborell Mgmt I, LLC; Aborell Advisors I, LLC; Aborell

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criteria. In particular, none of the accounts is identified in the TRO or PI or held for the benefit of any of the defendants. Nor do any of the defendants have account authority over the accounts.³ The UTMA account is held solely in the name of Jennifer Zhao as custodian for her son, David. The remaining bank accounts are held in the name of Ally Investors LLC, Ms. Zhao's business.

The Court in this matter appointed Thomas Seaman as the receiver for the entity defendants in this case ("Receiver"). I spoke with Mr. Seaman's attorney (David Zaro, who is copied on this letter), who informed me that the Receiver did not request BOA to freeze Ms. Zhao's accounts. The SEC has also not informed us that it directed BOA to freeze these accounts (the SEC attorneys, Donald Searles and Peter DelGreco, are also copied on this letter).

The funds in the frozen accounts are necessary for Ms. Zhao to pay her living expenses (including an upcoming property tax payment) and to operate her business. We request that BOA immediately unfreeze all of Ms. Zhao's and Ally Investors LLC's accounts that are listed above, except for account 01534-02299. If BOA refuses to do so, then please provide us with an explanation as to why the accounts are frozen with any supporting documentation.

Thank you in advance for your anticipated cooperation.

Very truly yours,



Thomas A. Zaccaro

ZACCARO MORGAN LLP

Encs.

Cc: David Zaro, Esq. (counsel for Receiver, Thomas Seaman)
Donald Searles, Esq. (U.S. Securities and Exchange Commission)
Peter DelGreco, Esq. (U.S. Securities and Exchange Commission)

REIT II, LLC; Ahome Real Estate, LLC; Alliance NGN; Inc., Apollo REIT I, Inc.; Apollo REIT II, LLC; Amkey Inc.; US China Consultation Association; and Quail Ranch Golf Course, LLC.

³ Bank of America has also frozen one other account (Account 01534-02299) that is jointly held by Mr. Chen and Ms. Zhou, but we are not requesting that the account be unfrozen at this time.